

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

T.M.,

Plaintiff,

v.

MICHIGAN DEPARTMENT OF  
EDUCATION,

Defendant.

No. 1:23-cv-00762-PLM-RSK

HON. PAUL L. MALONEY

MAG. RAY KENT

---

Elizabeth K. Abdnour (P78203)  
Attorney for Plaintiff  
ABDNOUR WEIKER, LLP  
500 E. Michigan Ave., Ste. 130  
Lansing, MI 48912  
(517) 994-1776  
liz@education-rights.com

Jacquelyn Babinski (P83575)  
Attorney for Plaintiff  
BARGER & GAINES  
90 Noth Broadway  
Irvington, NY 10533  
(914) 902-5918  
jacquelyn@bargergaines.com

Kathleen A. Halloran (P76453)  
Kelly A. Carter (P56129)  
Attorneys for Defendant  
Michigan Department of  
Attorney General  
Health, Education & Family  
Services Division  
P.O. Box 30758  
Lansing, MI 48909  
(517) 335-7603  
hallorank1@michigan.gov  
lavinell@michigan.gov  
carterk1@michigan.gov

---

**STIPULATION TO EXTEND DEFENDANT'S DEADLINE TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

The parties, by and through the undersigned counsel, stipulate to extend the deadline for Defendant Michigan Department of Education (MDE) to respond to Plaintiff's complaint (ECF No. 1). The parties agree to extend MDE's response deadline from to October 24, 2023 to November 17, 2023.

WHEREFORE, the parties respectfully request that this Honorable Court enter the attached proposed stipulated order to extend the deadline for MDE to respond to Plaintiff's Complaint.

IT IS SO STIPULATED.

Dated: 10-09-2023

/s/Kathleen A. Halloran  
Kathleen A. Halloran (P76453)  
Attorney for Defendant

Dated: 10-09-2023

/s/Elizabeth K. Abdnour (w/permission)  
Elizabeth K. Abdnour (P78203)  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

T.M.,

Plaintiff,

v.

MICHIGAN DEPARTMENT OF  
EDUCATION,

Defendant.

No. 1:23-cv-00762-PLM-RSK

HON. PAUL L. MALONEY

MAG. RAY KENT

---

Elizabeth K. Abdnour (P78203)  
Attorney for Plaintiff  
ABDNOUR WEIKER, LLP  
500 E. Michigan Ave., Ste. 130  
Lansing, MI 48912  
(517) 994-1776  
liz@education-rights.com

Jacquelyn Babinski (P83575)  
Attorney for Plaintiff  
BARGER & GAINES  
90 Noth Broadway  
Irvington, NY 10533  
(914) 902-5918  
jacquelyn@bargergaines.com

Kathleen A. Halloran (P76453)  
Kelly A. Carter (P56129)  
Attorneys for Defendant  
Michigan Department of  
Attorney General  
Health, Education & Family  
Services Division  
P.O. Box 30758  
Lansing, MI 48909  
(517) 335-7603  
hallorank1@michigan.gov  
lavinell@michigan.gov  
carterk1@michigan.gov

---

**ORDER GRANTING STIPULATION TO EXTEND DEADLINE TO  
RESPOND TO PLAINTIFF'S COMPLAINT**

This matter having come before the Court upon the parties' stipulation to  
extend the deadline for Defendant to respond to Plaintiffs' complaint,

IT IS HEREBY ORDERED that Defendant's response to Plaintiff's complaint is due on or before November 17, 2023.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. PAUL L. MALONEY  
United States District Judge